

Application granted. The parties shall, by November 12, 2021, file a joint letter, no longer than one page, providing the Court with the date, time, and duration or each additional meet and confer and advising as to the outcome of those discussions.

Should Defendants thereafter seek leave to file a motion for summary judgment, they shall serve and file by November 23, 2021: (1) a joint letter, no longer than five double-spaced pages, requesting a pre-motion conference; (2) the Local Civil Rule 56.1 Statement of Material Facts on Motion for Summary Judgment; and (3) a Local Civil Rule 56.2 Notice to Pro Se Litigant Who Opposes a Summary Judgment Motion. Plaintiff's opposition shall be served and filed by December 6, 2021.

Should Plaintiff seek summary judgment on any claim for relief in his own right, he may: (1) file his own pre-motion conference letter on November 23, 2021 (with Defendants' joint opposition due by December 6, 2021); or (2) request, in his December 6, 2021 opposition, that the Court search the record and grant summary judgment in his favor.

Plaintiff is cautioned that failure to oppose properly those facts contained in the 56.1 Statement will be deemed admitted.

The Clerk of the Court is respectfully directed to terminate the motion sequence pending at Doc. 55.

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
October 19, 2021

TROETTI, P.C.

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October 19, 2021

District of New York

Marom v. Detective Edgar DeMelo, et. al.
CV 03486 (PMH) (PED)

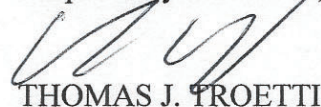
be the "meet and confer" efforts to determine if the Material Facts in accordance with Local Civil Rule 56.1.

Deputy Town Attorney Richard Marasse and I spoke for 20 minutes during which we discussed the broad scope of the statement without supporting references. Following the statement, on October 14 & 15, 2021 I had a further meeting with Mr. Marasse was away - for about 25 minutes on each day. Mr. Marom notified me that he intended to forward to me a revised proposed Local Rule 56.1 Statement by a drop box link to 23 exhibits. In a telephone call I notified him that I would seek to incorporate his comments and find them agreeable, into a joint Local Rule 56.1 Statement for him for his review.

and progress in their effort to agree upon a single Local Rule 56.1 Statement to exchange further drafts and exhibits, reach

agreement on disputed paragraphs and finalize a document which would be filed with the Court. Mr. Marasse also needs to participate in these "meets and confers." As a result, we jointly request an adjournment of our time to "meet and confer" for this purpose to November 12, 2021 and, if granted, further request that all subsequent submission dates be extended by a corresponding period of three (3) weeks. If the request for an adjournment is not granted, the defendants will submit a pre-motion letter and proposed joint Local Rule 56.1 Statement by the deadline of November 2, 2021.

Respectfully Submitted,



THOMAS J. TROETTI

cc: Mr. Michael Marom, Pro Se Plaintiff
Deputy Town Attorney Richard Marasse